

Attachment

Comments on Proposed Air Emissions Reporting Requirements – 40CFR Part 51

The following comments detail the Air Resources Board's responses to the proposed changes in the Air Emissions Reporting Requirements rule:

- **Accelerating Report Due Date:** The effort required to develop a complete emissions inventory at the process/device level requires a schedule consistent with the current 17-month cycle. This 17-month reporting schedule has proven effective for planning and regulatory development purposes and provides sufficient time for all Districts to collect and submit point source data to the State and provides the ARB with sufficient time to compile data, perform QA/QC, and resolve problems and errors. The current schedule allows sufficient time for the State to prepare a quality emission inventory before submitting it for inclusion in the National Emission Inventory. For these reasons, we believe the 17-month reporting schedule should be maintained.
- **Harmonizing Report Due Date:** While we agree in principle that harmonizing due dates for federal reporting rules is useful, we do not believe the schedule for reporting the point source emission inventory by December 31 of the following year is appropriate for California (i.e., December 31, 2009, for the 2008 inventory). This schedule is not feasible for California since emissions inventory submittals must be coordinated through 35 Districts. Technical and resource limitations result in many Districts requiring 10 months following the close of an inventory year to assemble data, conduct QA/QC, and submit their emission inventories to the State. The ARB requires approximately 7 months for compiling and processing data, performing QA/QC, resolving data submission issues, and finalizing the inventory. We believe the 17-month schedule, as currently allowed under CERR, should be maintained without change for submittal of the annual point source inventory to U.S. EPA.
- **Reporting Biogenic Emissions:** The ARB has spent considerable time and resources developing biogenic estimates specific to the State's vegetation and land use. We will continue to use our model and methodology in developing future biogenic emission inventories for California. We recommend that U.S. EPA provide the option for states to submit biogenic emission estimates. This will ensure that state-specific biogenic data are provided as inputs to the national database and that they are reviewed before any estimates are published.

- **Reporting Emission Model Inputs:** For source categories that U.S. EPA has developed—or is developing—suitable emission inventory estimation models, we concur with the proposal to allow states the option of either reporting actual emissions or providing U.S. EPA with emission inventory model inputs. However, ARB would not support a proposal of requiring states to report model inputs for use in U.S. EPA emission inventory models. A mandatory reporting requirement for model inputs would remove our option of reporting emissions in those cases where the ARB has an independent model or differing classifications/categories of emissions sources (e.g., on-road and off-road mobile sources).
- **New Data Elements:** The proposal indicates that the code “don’t know” is included in the domain for method accuracy description codes. It is not clear if similar codes are available for other proposed data elements such as emission release point type and control status. We suggest “N/A” be included in the domains for these elements.
- **Identification of New Emissions Related Data Requirements:** The following comments are in reference to the data elements in Table 2A to Subpart A of Part 51 – Data Elements for Reporting on Emissions from Point Sources, Where Required by 40CFR 51.30:
 - Data element 41, SIC/NAICS at the facility and unit levels, should be separated into two fields, one for the facility and another for the unit. This separation will clearly define and differentiate between the facility and unit.
 - Data elements 49, 33, and 34 (emission release point type, X stack coordinate, Y stack coordinate), and stack parameters are all associated with point source stacks. We recommend that these fields be grouped closely together. Similarly, all process related data, such as SIC/NAICS, SCC, heat content, ash content, activity, and temporal data should be grouped together with the process ID code.
- **Summer Day Emissions, Winter Work Week Day Emissions, and Revisions to Specific Data Elements:** We have no specific comments regarding these proposed revisions in the AERR.